

4. The Defendant submitted the monthly contribution reports but failed to submit the ERISA contributions shown to be owed. The amounts owed are set forth on Schedule 1, attached to Exhibit B, affidavit of Timothy Elliott.

5. The Defendant owes liquidated damages on the unpaid ERISA contributions pursuant to the Collective Bargaining Agreements, the Trust Agreements and 29 U.S.C. §1132(g)(2)(C)(ii). The amounts owed are set forth on Schedule 1, attached to Exhibit B, affidavit of Timothy Elliott.

6. The Defendant owes the sum of \$1,559.25 for necessary and reasonable attorney fees which are collectible under the terms of the Collective Bargaining Agreement, the Trust Agreements and 29 U.S.C. §1132(g)(2)(D). (Exhibit C, affidavit of Daniel P. McAnally)

WHEREFORE, Plaintiffs pray that their motion for entry of judgment be granted in the amount of \$56,440.43 as to Security Fence Co., only.

Respectively submitted,

s/ DANIEL P. McANALLY
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